

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

U. S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
**FILED**  
JUN 26 1980

ROBERT H. SHEMWELL, CLERK  
BY                      Deputy

UNITED STATES OF AMERICA,

Plaintiff

vs.

CIVIL ACTION NO. 14430

CATAHOULA PARISH SCHOOL BOARD,

Defendant

MOTION FOR SUPPLEMENTAL RELIEF

The Defendant, Catahoula Parish School Board, moves the court for supplemental relief in the form of modification of the Order of this Honorable Court under which it is now operating the public school system of Catahoula Parish, subject to the retained jurisdiction of this Court, in the following particulars, to-wit:

I

The Catahoula Parish School Board desires to modify the grade assignments to the Jonesville Junior High School and Block High School by changing the grade assignments which are now constituted as follows:

<u>PRESENT NAME AND GRADE</u>	<u>PROPOSED NAME AND GRADE - 1980-81</u>
(A) Jonesville Elementary - 5	Jonesville Junior High - 5
(B) Jonesville Junior High - 8	Block High School - 8

II

The reason for the Catahoula Parish School Board wanting to move the 5th grade from Jonesville Elementary School to Jonesville Junior High School is to alleviate the overcrowded condition at the elementary school.

III

The reason for the Catahoula Parish School Board wanting to transfer the 8th grade from Jonesville Junior High School to Block High School is to prevent overcrowding at the junior high school. Block High School has sufficient space to take care of the addi-

tional students that would be transferred without overcrowding.

IV


The School Board moves for an expedited hearing on this matter so that the necessary administrative arrangements may be made and the plan become effective as of the opening of the school year in August of 1980, for the 1980-81 school year.

V

A memorandum in support of this motion is enclosed.

Vidalia, Louisiana, this 25 day of June, 1980.


Respectfully submitted,

  
John Sturgeon, District Attorney  
Seventh Judicial District Court  
Courthouse  
Vidalia, Louisiana 71373  
318-336-5526

P.O. BOX 429  
FERRIDAY, LA. 71334

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

U. S. DISTRICT COURT  
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ROBERT H. SHEMWELL, CLERK  
BY  Deputy

UNITED STATES OF AMERICA,

Plaintiff

vs.

CIVIL ACTION NO. 14430

CATAHOULA PARISH SCHOOL BOARD,

Defendant

MEMORANDUM IN SUPPORT OF MOTION FOR SUPPLEMENTAL RELIEF

The Catahoula Parish School Board is operating under an Order issued by this Honorable Court on the 29th of July, 1969. This Order has been changed several times in minor respects, primarily due to reassignment of grades within the school system as enrollment figures and population figures change. The relief sought now by the School Board concerns the transfer of the 5th grade from Jonesville Elementary School to Jonesville Junior High School to alleviate the overcrowded condition at the elementary school. The 8th grade will then be transferred to Block High School. Block has adequate facilities to care for the additional students without being overcrowded. Grade sequence of the schools will then become K-4, Jonesville Elementary; 5-7, Jonesville Junior High; 8-12, Block High.

The following is a list of the student population to be transferred at the various schools as shown on the annual reports of March, 1980:

5th Grade - Jonesville Elementary School

Total number of students to be transferred	116
Total number of white students to be transferred	80
Total number of black students to be transferred	36

8th Grade - Jonesville Junior High School

Total number of students to be transferred	118
Total number of white students to be transferred	70
Total number of black students to be transferred	48

Since these grades are being transferred in their entirety, there will be no change in the racial ratios of Jonesville Elementary School or Jonesville Junior High School and neither will this change the racial ratio at Block High School.

In addition to the above transfer of students, the teachers of the grades involved are also to be transferred as follows:

5th Grade Teachers - Jonesville Elementary School

Total number of teachers to be transferred	6
Total number of white teachers to be transferred	3
Total number of black teachers to be transferred	3

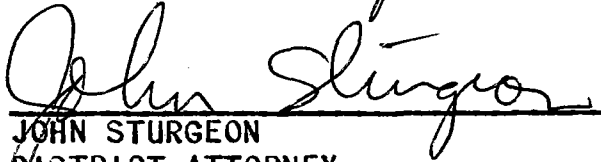
8th Grade Teachers - Jonesville Junior High School

Total number of teachers to be transferred	3
Total number of white teachers to be transferred	2
Total number of black teachers to be transferred	1

The transfer of these teachers include the teacher population of these grades in totality.

Please take notice that on the \_\_\_\_\_ day of \_\_\_\_\_, 1980, and/or as soon thereafter as counsel may be heard, in the Alexandria Division of Western District of Louisiana, the United States District Court, Catahoula Parish School Board will bring the aforesaid motion for supplemental relief for a hearing.

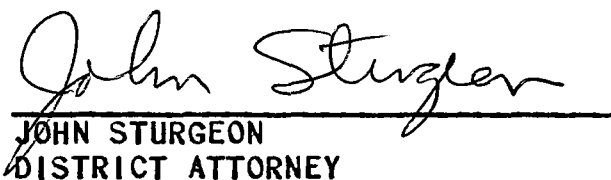
Vidalia, Louisiana, this 25 day of June, 1980.

  
\_\_\_\_\_  
JOHN STURGEON  
DISTRICT ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion for Supplementary Relief and Supporting Memorandum was mailed postage prepaid, this day, to Mr. Stanley Halpin, Jr., Attorney for the Plaintiff, at his address in New Orleans, Louisiana; to Mr. Donald Walker, the United States Attorney for the Western Division of Louisiana; U. S. Courtroom, P. O. Box Building, Alexandria; and to Deputy Chief, Civil Rights Division, United States Department of Justice, Washington, D. C.

Vidalia, Louisiana, this 25 day of June, 1980.

  
\_\_\_\_\_  
JOHN STURGEON  
DISTRICT ATTORNEY

P. O. BOX 429  
FERRIDAY, LA. 71334

IT IS ORDERED that the foregoing Motion for Supplemental Relief be heard at \_\_\_\_\_ o'clock \_\_\_\_ M., on the \_\_\_\_\_ day of \_\_\_\_\_, 1980, at the United States Courtroom, Alexandria, Louisiana.

---

NAUMAN S. SCOTT  
DISTRICT JUDGE

Order  
*JS*

OFFICE OF  
**THE DISTRICT ATTORNEY**  
SEVENTH JUDICIAL DISTRICT

CONCORDIA AND CATAHOULA PARISHES

JOHN STURGEON  
DISTRICT ATTORNEY P. O. Box 429  
COURTHOUSE Ferriday, La. 71334  
VIDALIA, LOUISIANA 71373

GLENN B. GREMILLION  
FIRST ASSISTANT DISTRICT ATTORNEY  
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P. O. DRAWER A  
HARRISONBURG, LOUISIANA 71340

PAUL SCOTT  
CHIEF INVESTIGATOR  
COURTHOUSE  
VIDALIA, LOUISIANA 71373

TELEPHONES:

VIDALIA, LA. 336-5526  
FERRIDAY, LA. 757-2140  
HARRISONBURG, LA. 744-5232  
MONTEREY, LA. 386-2237  
386-7430

4151

June 25, 1980

Clerk of Court  
U. S. District Court  
Western District  
Federal Building  
424 Texas Street  
Shreveport, La. 71101

U. S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

**FILED**

JUN 26 1980

ROBERT H. SHEMWELL, CLERK  
BY \_\_\_\_\_ Deputy

Re: Civil Action #14430  
United States of America  
vs  
Catahoula Parish School Board

Dear Sir:

Find enclosed Motion for Supplemental Relief and Memorandum in Support of Motion for Supplemental Relief concerning the above referenced matter. Please forward the original of this Motion to Judge Scott for it to be placed on his calendar for hearing in Alexandria Division at a time to be set by Judge Scott. I am, by copy of this letter, notifying the various attorneys of record of the filing of the Motion for Supplemental Relief.

The basic relief sought is the transfer of one grade from the Jonesville Elementary to the Jonesville Junior High and a transfer of the 8th grade of Jonesville Junior High to the Block High School. The reason for the relief being sought is overcrowded conditions at the Elementary school. The grades will be transferred in total with teachers and should not amount to any changes in any racial ratios within the school system.

Sincerely,

*John Sturgeon*

John Sturgeon  
JS/cg  
Enclosures

Clerk of Court  
June 25, 1980  
Page Two

cc: Mr. Stanley Halpin, Jr.  
Attorney Suite 1212  
344 Camp  
New Orleans, La.

U. S. Attorney for Western  
District of Louisiana  
U. S. Courtroom  
Alexandria, La.

Deputy Chief  
Civil Rights Division  
U. S. Dept. of Justice  
Washington, D. C. 20530

Sam Dale, Superintendent  
Catahoula Parish School Board  
Jonesville, La. 71343



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

versus

No. 14,430

CATAHOULA PARISH SCHOOL BOARD; ET AL

NOTICE OF SETTING MOTION

PLEASE TAKE NOTICE THAT THE MOTION DESCRIBED BELOW IS SET FOR  
ARGUMENT BEFORE THE HONORABLE NAUMAN S. SCOTT AT 9:00 A.M.

ON MONDAY, JULY 21, 1980, ON THE SECOND FLOOR OF THE POST  
OFFICE BUILDING IN ALEXANDRIA, LOUISIANA.

TIME FOR BRIEFING IS GOVERNED BY LOCAL RULE 10(f) WHICH IS SET  
OUT BELOW. JUDGE SCOTT MAY DECIDE THE MOTION PRIOR TO HEARING ON  
THE BASIS OF THE RECORD.

SHREVEPORT, LOUISIANA THIS 1st DAY OF July, 1980.

DESCRIPTION OF MOTION:

ROBERT H. SHEM WELL,  
CLERK OF COURT

By Defendant, Catahoula Parish School

Board, for supplemental relief,

filed 6-26-80.

BY:

Robert H. Shemwell  
Deputy Clerk

NOTE: IF A COURT REPORTER WILL BE NEEDED, NOTIFY THE COURT, IN  
WRITING, 10 DAYS PRIOR TO THE MOTION HEARING DATE.

(f) RESPONSE AND BRIEF. IF THE RESPONDENT OPPOSES A MOTION, HE  
SHALL FILE HIS RESPONSE, INCLUDING OPPOSING AFFIDAVITS (IF THE  
MOTION IS ONE FOR SUMMARY JUDGMENT PURSUANT TO RULE 56(c) OF THE  
FEDERAL RULES OF CIVIL PROCEDURE), BRIEF, AND SUCH SUPPORTING DOCU-  
MENTS AS ARE THEN AVAILABLE, WITHIN TEN DAYS AFTER SERVICE OF THE  
MOTION. BRIEFS SHALL CONTAIN A CONCISE STATEMENT OF REASONS IN  
OPPOSITION TO THE MOTION, AND A CITATION OF AUTHORITIES UPON WHICH  
THE RESPONDENT RELIES. FOR GOOD CAUSE APPEARING THEREFOR, A  
RESPONDENT MAY BE REQUIRED TO FILE HIS RESPONSE AND SUPPORTING  
DOCUMENTS, INCLUDING BRIEFS, WITHIN SUCH SHORTER PERIOD OF TIME  
AS THE COURT MAY SPECIFY, OR MAY BE GIVEN ADDITIONAL TIME AS PRO-  
VIDED IN SUBSECTION (h) OF THIS RULE, TO FILE THE RESPONSE, INCLUDING  
DOCUMENTS AND BRIEF.

COPY SENT

DATE 7-7-80

BY am

TO: Atty. Gen.

James  
Sturgeon